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(724) 597-8219

March 18, 2014

VIA OVERNIGHT DELIVERY

Mr. Mark Wayner
Southwest Region Air Program Manager
PA Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Re: Conemaugh Power Plant (Permit No. TV-32-00059)
Units 1 and 2 (TVOP Source ID Nos. 031 and 032)
Revised Mercury and Air Toxics Standards (MATS) Extension Request

Dear Mr. Wayner:

Per conversations and feedback from PADEP regional and central office staff, GenOn Northeast Management Company ("GenOn"), operator of Conemaugh Power Plant ("Conemaugh"), is submitting this revised request for a Mercury and Air Toxics Standards (MATS) Extension for Conemaugh Units 1 and 2 to the Pennsylvania Department of Environmental Protection's ("DEP" or "Department") for consideration and approval. This revised request amends the original request (submitted via letter from Keith Schmidt to Mark Wayner on January 2, 2014) by changing the exemption duration to six months. This request also includes additional detail on the control subsystems with the potential to require optimization tuning. Please recall that GenOn submitted a Plan Approval Application for the installation of a Selective Catalytic Reduction ("SCR") system in December 2010. The Department issued a Plan Approval in March of 2012. GenOn also submitted a Request for Determination ("RFD") in September 2011 for a Flue Gas Desulfurization ("FGD") Upgrade Project, which included installation of absorption trays and a fines reinjection system. Concurrence from the DEP that the project did not require a Plan Approval was received in December of 2011. Combined, these two emission control projects ("Projects") are critical for Conemaugh to comply with MATS, specifically the MATS mercury ("Hg") emission limits.

In the submittals described above, GenOn projected Project completion in Fall 2014. Currently the Projects remain on schedule, but GenOn is concerned that period between completion and the MATS compliance date of April 16, 2015 may be insufficient to fully test, tune and optimize the FGD Upgrades to effectively capture the increased concentration of oxidized or ionic Hg that will result from the catalyst layer installed in the SCR system.

MATS Rule and Compliance Extension Provision

On February 16, 2012, the Federal Environmental Protection Agency ("EPA") issued the NESHAP for Coal- and Oil-fired Electric Utility Generating Units [40 CFR Part 63 Subpart UUUUU], ("subpart UUUUU"). 77 Fed. Reg. 9304. MATS requires compliance by April 16, 2015. Pursuant to 112(i)(3)(B) of the Clean Air Act ("CAA"), Title V permitting authorities were granted the ability to extend the 3 year compliance deadline up to one additional year as noted below:

> **CAA *112(i)(3)(B)***
>
> *The Administrator (or a State with a program approved under subchapter V of this chapter) may issue a permit that grants an extension permitting an existing source up to 1 additional year to comply with standards under subsection (d) of this section if such additional period is necessary for the installation of controls.*

Further, EPA has stated:

> **77 Fed. Reg. 9410**
>
> *The EPA believes that although most units will be able to fully comply within 3 years, the fourth year that permitting authorities are allowed to grant for installation of controls is an important flexibility that will address situations where an extra year is necessary. That fourth year should be broadly available to enable a facility owner to install controls within 4 years if the 3-year time frame is inadequate for completing the installation.*

While GenOn does not expect to need the compliance extension for construction, testing and tuning or "shakedown" and optimization will likely continue at least six months beyond the April 16, 2015 compliance date and, accordingly, shakedown and optimization should be considered part of "installation of controls". Additionally, the SCR system under construction will not be equipped with a bypass; if the Projects, particularly the FGD Upgrades, perform as designed and the initial commissioning effort is successful, Conemaugh Units 1 and 2 will meet the MATS emission limits on or shortly after the MATS compliance date. However, it is GenOn's concern that Conemaugh could be in the unenviable position of having installed the required controls, but still in the process of testing and tuning as of April 16, 2015. This scenario would necessitate a last-minute compliance extension request. Based on extensive pre-construction diagnostic testing, Conemaugh will require both the SCR for mercury oxidation and the FGD Upgrades to limit mercury reemission to comply with MATS mercury limits on a continuous basis.

The Conemaugh FGD Upgrades Project completed preliminary Hg Performance Test post FGD Upgrades on Conemaugh Unit #2 in December 2013. The preliminary testing was conducted utilizing Carbon Traps in an effort to assess achievement of contractual performance guarantees. In short, the preliminary test results indicate sufficient capture of ionic Hg but also show a significant increase of elemental Hg across the FGD indicating re-emission, reduction of oxidized to elemental Hg, levels that are consistent with pre upgrade levels. The preliminary Hg Performance test appears flawed in that: 1) the % ionic, the soluble and readily captured Hg

species, at the inlet to the absorbers is significantly higher than it was in prior test which likely explains the re-emission levels and 2) the reinjection of fines to the Absorbers was insufficient and will require significant operational tuning of the installed equipment. At this point the FGD Upgrades Project Team, the FGD Upgrades Vendor, and Conemaugh Station recognize the need to optimize the Dewatering/Fines Reinjection System and ensure proper operating condition of the FGD balance of plant equipment prior to Final Performance Testing of Conemaugh Unit #2 (and subsequently Conemaugh Unit #1). To that end a revised project schedule was developed. The revised schedule is attached for your information (see Attachment D).

This request focuses on the MATS Hg limits, because Conemaugh, as currently configured, can demonstrate continuous compliance with acid gas limits, through either i) hydrogen chloride ("HCl") surrogate of 0.002 lbs/MMBtu, or ii) the sulfur dioxide ("SO_2") surrogate of 0.2 lb/MMBtu, and the non-mercury metals limit, through the filterable particulate matter ("PM") surrogate of 0.03 lb/MMBtu.

Schedule and Compliance Extension Request

To further highlight Conemaugh's commitment to completion of the Projects, GenOn has included an update to the schedule of the Projects. The FGD upgrades have been completed on two of the five absorber modules, but the full efficacy of those upgrades for Hg removal cannot be evaluated until the SCR is in service to oxidize the Hg to be removed in the FGD and ensure Hg captured in the upgraded FGD is not reemitted. Also included in this submittal are the required Request for Waiver of the Initial Performance Test and Request for Waiver of Recordkeeping and/or Reporting Requirements. Please note that the Request for Waiver of the Initial Performance Test is not a request for exemption from the initial test required by the SCR Plan Approval (PA-32-00059E, §E Condition #002). That test program includes testing for Hg, which will be completed within 180-days of startup of the SCR as required.

Attachments

The following forms and informational attachments are included in this request.

Attachment A	Request for MATS Compliance Extension Form
Attachment B	Request for Waiver of the Initial Performance Test
Attachment C	Request for Waiver of Recordkeeping and/or Reporting Requirements
Attachment D	Revised Project Schedule
Attachment E	Copy of Cover Letters for FGD Upgrade RFD and SCR Plan Approval Application

GenOn respectfully requests that the six month extension and waivers be granted. If you have any questions, comments or require further information, please contact me or Keith Schmidt at (724) 597-8193 (keith.schmidt@nrgenergy.com).

Sincerely,

Brian W. Green
Senior Air Quality Specialist

Attachments

CC: Mark Gorog, DEP
Vince Brisini, DEP

ATTACHMENT A

Request for MATS Compliance Extension Form

Request for Extension of Compliance

THIS IS A SAMPLE NOTIFICATION FORM, WHICH CAN BE USED BY FACILITIES AT THEIR DISCRETION TO MEET COMPLIANCE WITH 40 CFR 63 Subpart A, §63.9(c) and/or §63.6(i)

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Request for extension of compliance is being made in accordance with §63.9(c) and/or §63.6(i).

NOTE: Until an extension of compliance has been granted by the Administrator (or State with an approved permit program), the owner or operator of an affected source subject to a part 63 standard shall comply with all applicable requirements of that standard (§63.6(i)(1).

Requests for extension of compliance *with a relevant standard are due not later than* ***120 days prior to the affected source's compliance date*** *[as specified in §63.6(b) and (c)] except as noted below. Emissions standards established under this part may specify an alternative date (e.g., other than 120 days) for the submittal of requests for an extension of compliance if alternatives are appropriate for the source categories affected by those standards. Please check the relevant standard for alternative submittal dates. (§63.6(i)(4)(i)(B))*

- *An owner or operator of an existing source unable to comply with a relevant standard established under this part pursuant to section 112(f) of the Act may request that the Administrator grant an extension allowing the source up to 2 years after the standard's effective date to comply with the standard. The Administrator may grant such an extension if he/she finds that such additional period is necessary for the installation of controls and that steps will be taken during the period of the extension to assure that the health of persons will be protected from imminent endangerment. All such requests for an extension of compliance with a relevant standard are due not later than* ***90 calendar days after the effective date*** *of the relevant standard. (§63.6(i)(4)(ii), §63.6(i)(3)*

- *An owner or operator of an existing source that has installed BACT or technology required to meet LAER [as specified in (§63.6(i)(2)(ii)] prior to the promulgation of a relevant emission standard in this part may request that the Administrator grant an extension allowing the source 5 years from the date on which such installation was achieved, as determined by the Administrator, to comply with the standard. The Administrator may grant such an extension if he or she finds that the installation of BACT or technology to meet LAER controls the same pollutant (or stream of pollutants) that would be controlled at that source by the relevant emission standard. All such requests for an extension of compliance with a relevant standard are due not later than* ***120 days after the promulgation date*** *of the standard. (§63.6(i)(5), §63.6(i)(2)(ii))*

- *An owner or operator of an affected source may submit a compliance extension request if the existing source demonstrates that it has achieved a reduction in emissions of hazardous air pollutants in accordance with the provisions of subpart D, Regulations Governing Compliance Extensions for Early Reductions of Hazardous Air Pollutants. The early reduction program is not discussed here, please see Subpart D for further information (§63.6(i)(2)(i))*

SECTION I
GENERAL INFORMATION

A. Print or type the following information for each facility for which you are requesting an extension of compliance (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)	Facility I.D. Number (OPTIONAL)
32-00059	

Responsible Official's Name/Title: John A. Balog/ General Manager – Conemaugh

Street Address: 1442 Power Plant Road

City	State	ZIP Code
New Florence	PA	15944

Facility Name (if different from Responsible Official's Name): Conemaugh Power Plant

Facility Street Address (If different than Responsible Official's Street Address): Same as Responsible Official's

Facility Local Contact Name	Title	Phone (OPTIONAL)

City	State	ZIP Code

B. Indicate the relevant standard or other requirement that is the basis for this request for this compliance extension request:

40 CFR Part 63 Subpart UUUUU - Mercury and Air Toxics Standards (MATS)

C. I am eligible to apply for a compliance extension for the following reasons: (check all that apply)

☑ I am unable to comply with the relevant standard and need additional time for the installation of controls (§63.6(i)(4)(i)(A))

☐ I installed best available control technology (BACT) or lowest achievable emission rate (LEAR) prior to promulgation of the relevant standard (§63.6(i)(2)(ii))

☐ I am participating in an early reductions program (63.6(i)(2)(i)). If you check this box, this is the **END OF FORM**. Please see Subpart D for further instruction.

D. Are you submitting this compliance extension request less than times indicated on page 1 for submitted an extension request? (§63.6(i)(4)(i)(C))

☐ Yes ☑ No

If you answered yes, state the reasons why additional time is needed and the date when you first learned of the problems. (§63.6(i)(4)(i)(C))

Reasons why additional time is needed

Date (mm/dd/yy) first learned of the problems

E. Are you requesting a waiver of the initial performance test required under the applicable relevant standard in conjunction with this request for an extension of compliance? (§63.7(h)(3)(i)-(iii))

☑ Yes ☐ No

If you answered yes, you must submit the application for a waiver of the initial performance test together with this request for an extension of compliance. The application for waiver shall include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the affected source performing the required test. (§63.7(h)(3)(i)-(iii))

F. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard in conjunction with this request for an extension of compliance? (§63.10(f)(3))

☑ Yes ☐ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this request for an extension of compliance. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping and/or reporting is warranted. (§63.10(f)(3))

G. If you are unable to comply based on the need for additional time to install controls, ***complete Sections II. and III.***

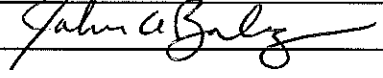
If you have installed BACT or LEAR, ***complete Sections II, III, and N.***

SECTION II
CERTIFICATION *(Note: you may edit the text in this section as deemed appropriate)*

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this request is accurate and true to the best of my knowledge.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
John A. Balog	General Manager - Conemaugh	3/18/2014

Signature of Responsible Official



Note: Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.

SECTION III
COMPLIANCE SCHEDULE INFORMATION

A. Describe the controls that will be installed at your facility to ensure compliance with the relevant standard. (§63.6(i)(6)(i)(A))

Selective Catalytic Reduction and Flue Gas Desulfurization Upgrades

B. Describe your compliance schedule by specifying the date by which you will complete each of the following steps toward achieving compliance: (§63.6(i)(6)(i)(B)(1)-(2))

1. Specify the date by which on-site construction, installation of emission control equipment, or a process change is to be initiated. (§63.6(i)(6)(i)(B)(1))

Activity that will be initiated						Date (mm/dd/yy)
☐	On-site construction	✔	Installation of emission control equipment	☐	Process change	3/30/2012

Comments (Optional)

2. Specify the date by which final compliance is to be achieved. (§63.6(i)(6)(i)(B)(2))

Date (mm/dd/yy)

October 16, 2015

SECTION IV
ADDITIONAL SUPPORTING INFORMATION

Note: complete this section only if you installed BACT or technology required to meet LAER prior to the promulgation of the applicable relevant emission standard.

Provide additional information (e.g., illustrative text, diagrams, manufacturer's specifications) to demonstrate to the Administrator's satisfaction that the installation of BACT or technology to meet LAER controls the same pollutant (or stream of pollutants) that would be controlled at that source by the relevant emission standard. (§63.6(i)(6)(ii))

Narrative discussion

Indicate any attachments you are including as supporting information:

☐ Diagrams
☐ Manufacturer's specifications
☐ Other (describe below)

Description of other attachments

END OF FORM - Please make sure that a Responsible Official signs Section II prior to submitting the form to your EPA Regional Office or your State Air Permitting Agency, as applicable.

ATTACHMENT B

Request for Waiver of the Initial Performance Test

ATTACHMENT B

Conemaugh Power Plant (TVOP# 32-00059)
Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2)

Request for Waiver of the Initial Performance Test

40 CFR 63 Subpart UUUUU requires compliance and performance tests to demonstrate compliance as specified below:

§ 63.9984 When do I have to comply with this subpart?

(b) If you have an existing EGU, you must comply with this subpart no later than April 16, 2015.

(f) You must demonstrate that compliance has been achieved, by conducting the required performance tests and other activities, no later than 180 days after the applicable date in paragraph (a), (b), (c), (d), or (e) of this section.

Affected sources requesting an extension from Part 63 requirements have the ability to petition the Administrator for a waiver of performance test requirements:

40 CFR §63.7 Performance testing requirements.

(h) Waiver of performance tests.

(1) Until a waiver of a performance testing requirement has been granted by the Administrator under this paragraph, the owner or operator of an affected source remains subject to the requirements of this section.

(2) Individual performance tests may be waived upon written application to the Administrator if, in the Administrator's judgment, the source is meeting the relevant standard(s) on a continuous basis, or the source is being operated under an extension of compliance, or the owner or operator has requested an extension of compliance and the Administrator is still considering that request.

(3) Request to waive a performance test.

(i) If a request is made for an extension of compliance under § 63.6(i), the application for a waiver of an initial performance test shall accompany the information required for the request for an extension of compliance. If no extension of compliance is requested or if the owner or operator has requested an extension of compliance and the Administrator is still considering that request, the application for a waiver of an initial performance test shall be submitted at least 60 days before the performance test if the site-specific test plan under paragraph (c) of this section is not submitted.

(ii) If an application for a waiver of a subsequent performance test is made, the application may accompany any required compliance progress report, compliance status report, or excess emissions and continuous monitoring system performance

report [such as those required under § 63.6(i), § 63.9(h), and § 63.10(e) or specified in a relevant standard or in the source's title V permit], but it shall be submitted at least 60 days before the performance test if the site-specific test plan required under paragraph (c) of this section is not submitted.

(iii) Any application for a waiver of a performance test shall include information justifying the owner or operator's request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the affected source performing the required test.

GenOn Northeast Management Company ("GenOn") requests a waiver from Mercury and Air Toxics Standards ("MATS") performance test requirements for Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2), (the "Units"). This waiver request accompanies the MATS Extension request. Records of the MATS Initial Notification of Applicability and all exemption and waiver requests will be maintained as required by regulation.

GenOn requests a waiver from MATS performance test requirements to allow for testing, tuning and optimization of installed controls to achieve MATS compliance. As stated in the cover letter of the MATS Extension request, Project completion schedule will provide very little time to gain experience to achieve mercury reductions on a continuous basis to demonstrate MATS compliance.

GenOn requests DEP grant Conemaugh a waiver from MATS performance test requirements during the requested six month compliance extension.

CERTIFICATION

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the statements contained in this request are true, accurate and complete to the best of my knowledge.

Name of Responsible Official, Title

John A. Balog, General Manager - Conemaugh

Signature of Responsible Official, Date

John A Balog 3/18/2014

ATTACHMENT C

Request for Waiver of Recordkeeping and/or Reporting Requirements

ATTACHMENT C

Conemaugh Power Plant (TVOP# 32-00059)
Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2)

Request for Waiver of Recordkeeping and/or Reporting Requirements

40 CFR 63 Subpart UUUUU requires reporting and recordkeeping as specified below:

§ 63.10031 What reports must I submit and when?

(a) You must submit each report in Table 8 to this subpart that applies to you. If you are required to (or elect to) continuously monitor Hg and/or HCl and/or HF emissions, you must also submit the electronic reports required under appendix A and/or appendix B to the subpart, at the specified frequency.

(b) Unless the Administrator has approved a different schedule for submission of reports under § 63.10(a), you must submit each report by the date in Table 8 to this subpart and according to the requirements in paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in § 63.9984 and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the compliance date that is specified for your source in § 63.9984.

(2) The first compliance report must be postmarked or submitted electronically no later than July 31 or January 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in § 63.9984.

(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) Each subsequent compliance report must be postmarked or submitted electronically no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each affected source that is subject to permitting regulations pursuant to part 70 or part 71 of this chapter, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information required in paragraphs (c)(1) through (4) of this section.

(1) The information required by the summary report located in 63.10(e)(3)(vi).

(2) The total fuel use by each affected source subject to an emission limit, for each calendar month within the semiannual reporting period, including, but not limited to, a description of

the fuel, whether the fuel has received a non-waste determination by EPA or your basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.

(3) Indicate whether you burned new types of fuel during the reporting period. If you did burn new types of fuel you must include the date of the performance test where that fuel was in use.

(4) Include the date of the most recent tune-up for each unit subject to the requirement to conduct a performance tune-up according to § 63.10021(e). Include the date of the most recent burner inspection if it was not done every 36 (or 48) months and was delayed until the next scheduled unit shutdown.

(d) For each excess emissions occurring at an affected source where you are using a CMS to comply with that emission limit or operating limit, you must include the information required in § 63.10(e)(3)(v) in the compliance report specified in section (c).

(e) Each affected source that has obtained a Title V operating permit pursuant to part 70 or part 71 of this chapter must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 8 to this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in this subpart, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report. Submission of a compliance report does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.

(f) As of January 1, 2012, and within 60 days after the date of completing each performance test, you must submit the results of the performance tests required by this subpart to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using those test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority.

(1) Within 60 days after the date of completing each CEMS (SO2 , PM, HCl, HF, and Hg) performance evaluation test, as defined in § 63.2 and required by this subpart, you must submit the relative accuracy test audit (RATA) data (or, for PM CEMS, RCA and RRA data) required by this subpart to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). The RATA data shall be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (http://www.epa.gov/ttn/chief/ert/index.html). Only RATA data compounds listed on the ERT Web site are subject to this requirement. Owners or operators who claim that some of the information being submitted for RATAs is confidential business information (CBI) shall submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) by registered letter to EPA and the same ERT file with the CBI omitted to EPA via CDX as described earlier in this paragraph. The compact disk or other commonly used electronic storage media shall be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. At the discretion of the delegated authority, owners or operators shall also submit these RATAs to the delegated authority in the format specified by the delegated authority. Owners or operators shall submit calibration error testing, drift checks, and other information required in the performance evaluation as described in § 63.2 and as required in this chapter.

(2) For a PM CEMS, PM CPMS, or approved alternative monitoring using a HAP metals CEMS, within 60 days after the reporting periods ending on March 31st, June 30th, September 30th, and December 31st, you must submit quarterly reports to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). You must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format. For each reporting period, the quarterly reports must include all of the calculated 30-boiler operating day rolling average values derived from the CEMS and PM CPMS.

(3) Reports for an SO2 CEMS, a Hg CEMS or sorbent trap monitoring system, an HCl or HF CEMS, and any supporting monitors for such systems (such as a diluent or moisture monitor) shall be submitted using the ECMPS Client Tool, as provided for in Appendices A and B to this subpart and § 63.10021(f).

(4) Submit the compliance reports required under paragraphs (c) and (d) of this section and the notification of compliance status required under § 63.10030(e) to EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). You must use the appropriate electronic reporting form in CEDRI or provide an alternate electronic file consistent with EPA's reporting form output format.

(5) All reports required by this subpart not subject to the requirements in paragraphs (f)(1) through (4) of this section must be sent to the Administrator at the appropriate address listed in § 63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The Administrator retains the

right to require submittal of reports subject to paragraphs (f)(1), (2), and (3) of this section in paper format.

(g) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded.

Table 8 to Subpart UUUUU of Part 63—Reporting Requirements

As stated in § 63.10031, you must comply with the following requirements for reports:

You must submit a . . .	***The report must contain . . .***	***You must submit the report . . .***
1. Compliance report	*a. Information required in § 63.10031(c)(1) through (4); and b. If there are no deviations from any emission limitation (emission limit and operating limit) that applies to you and there are no deviations from the requirements for work practice standards in Table 3 to this subpart that apply to you, a statement that there were no deviations from the emission limitations and work practice standards during the reporting period. If there were no periods during which the CMSs, including continuous emissions monitoring system, and operating parameter monitoring systems, were out-of-control as specified in § 63.8(c)(7), a statement that there were no periods during which the CMSs were out-of-control during the reporting period; and*	*Semiannually according to the requirements in § 63.10031(b).*
	c. If you have a deviation from any emission limitation (emission limit and operating limit) or work practice standard during the reporting period, the report must contain the information in § 63.10031(d). If there were periods during which the CMSs, including continuous emissions monitoring systems and continuous parameter monitoring systems, were out-of-control, as specified in § 63.8(c)(7), the report must contain the information in § 63.10031(e)	

§ 63.10032 What records must I keep?

(a) You must keep records according to paragraphs (a)(1) and (2) of this section. If you are required to (or elect to) continuously monitor Hg and/or HCl and/or HF emissions, you must also keep the records required under appendix A and/or appendix B to this subpart.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that you submitted, according to the requirements in § 63.10(b)(2)(xiv).

(2) Records of performance stack tests, fuel analyses, or other compliance demonstrations and performance evaluations, as required in § 63.10(b)(2)(viii).

(b) For each CEMS and CPMS, you must keep records according to paragraphs (b)(1) through (4) of this section.

(1) Records described in § 63.10(b)(2)(vi) through (xi).

(2) Previous (i.e. , superseded) versions of the performance evaluation plan as required in § 63.8(d)(3).

(3) Request for alternatives to relative accuracy test for CEMS as required in § 63.8(f)(6)(i).

(4) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(c) You must keep the records required in Table 7 to this subpart including records of all monitoring data and calculated averages for applicable PM CPMS operating limits to show continuous compliance with each emission limit and operating limit that applies to you.
(d) For each EGU subject to an emission limit, you must also keep the records in paragraphs (d)(1) through (3) of this section.

(1) You must keep records of monthly fuel use by each EGU, including the type(s) of fuel and amount(s) used.

(2) If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(2), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), you must keep a record which documents how the fuel satisfies the requirements of the petition process.

(3) For an EGU that qualifies as an LEE under § 63.10005(h), you must keep annual records that document that your emissions in the previous stack test(s) continue to qualify the unit for LEE status for an applicable pollutant, and document that there was no change in source operations including fuel composition and operation of air pollution control equipment that would cause emissions of the pollutant to increase within the past year.

(e) If you elect to average emissions consistent with § 63.10009, you must additionally keep a copy of the emissions averaging implementation plan required in § 63.10009(g), all calculations required under § 63.10009, including daily records of heat input or steam generation, as applicable, and monitoring records consistent with § 63.10022.

(f) You must keep records of the occurrence and duration of each startup and/or shutdown.

(g) You must keep records of the occurrence and duration of each malfunction of an operation (i.e. , process equipment) or the air pollution control and monitoring equipment.

(h) You must keep records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.10000(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(i) You must keep records of the type(s) and amount(s) of fuel used during each startup or shutdown.

(j) If you elect to establish that an EGU qualifies as a limited-use liquid oil-fired EGU, you must keep records of the type(s) and amount(s) of fuel use in each calendar quarter to document that the capacity factor limitation for that subcategory is met.

Table 7 to Subpart UUUUU of Part 63—Demonstrating Continuous Compliance

As stated in § 63.10021, you must show continuous compliance with the emission limitations for affected sources according to the following:

If you use one of the following to meet applicable emissions limits, operating limits, or work practice standards . . .	***You demonstrate continuous compliance by . . .***
1. CEMS to measure filterable PM, SO_2, HCl, HF, or Hg emissions, or using a sorbent trap monitoring system to measure Hg	*Calculating the 30- (or 90-) boiler operating day rolling arithmetic average emissions rate in units of the applicable emissions standard basis at the end of each boiler operating day using all of the quality assured hourly average CEMS or sorbent trap data for the previous 30- (or 90-) boiler operating days, excluding data recorded during periods of startup or shutdown.*
2. PM CPMS to measure compliance with a parametric operating limit	*Calculating the 30- (or 90-) boiler operating day rolling arithmetic average of all of the quality assured hourly average PM CPMS output data (e.g., milliamps, PM concentration, raw data signal) collected for all operating hours for the previous 30- (or 90-) boiler operating days, excluding data recorded during periods of startup or shutdown.*
3. Site-specific monitoring using CMS for liquid oil-fired EGUs for HCl and HF emission limit monitoring	*If applicable, by conducting the monitoring in accordance with an approved site-specific monitoring plan.*
4. Quarterly performance testing for coal-fired, solid oil derived fired, or liquid oil-fired EGUs to measure compliance with one or more non-PM (or its alternative emission limits) applicable emissions limit in Table 1 or 2, or PM (or its alternative emission limits) applicable emissions limit in Table 2	*Calculating the results of the testing in units of the applicable emissions standard.*
5. Conducting periodic performance tune-ups of your EGU(s)	*Conducting periodic performance tune-ups of your EGU(s), as specified in § 63.10021(e).*

6. Work practice standards for coal-fired, liquid oil-fired, or solid oil-derived fuel-fired EGUs during startup	*Operating in accordance with Table 3.*
7. Work practice standards for coal-fired, liquid oil-fired, or solid oil-derived fuel-fired EGUs during shutdown	*Operating in accordance with Table 3.*

Affected sources requesting an extension from Part 63 requirements have the ability to petition the Administrator for a waiver of recordkeeping and/or reporting requirements:

40 CFR §63.10 Recordkeeping and reporting requirements.

(f) Waiver of recordkeeping or reporting requirements.

(1) Until a waiver of a recordkeeping or reporting requirement has been granted by the Administrator under this paragraph, the owner or operator of an affected source remains subject to the requirements of this section.

(2) Recordkeeping or reporting requirements may be waived upon written application to the Administrator if, in the Administrator's judgment, the affected source is achieving the relevant standard(s), or the source is operating under an extension of compliance, or the owner or operator has requested an extension of compliance and the Administrator is still considering that request.

(3) If an application for a waiver of recordkeeping or reporting is made, the application shall accompany the request for an extension of compliance under § 63.6(i), any required compliance progress report or compliance status report required under this part (such as under § 63.6(i) and § 63.9(h)) or in the source's title V permit, or an excess emissions and continuous monitoring system performance report required under paragraph (e) of this section, whichever is applicable. The application shall include whatever information the owner or operator considers useful to convince the Administrator that a waiver of recordkeeping or reporting is warranted.

(4) The Administrator will approve or deny a request for a waiver of recordkeeping or reporting requirements under this paragraph when he/she—

(i) Approves or denies an extension of compliance; or

(ii) Makes a determination of compliance following the submission of a required compliance status report or excess emissions and continuous monitoring systems performance report; or

(iii) Makes a determination of suitable progress towards compliance following the submission of a compliance progress report, whichever is applicable.

(5) A waiver of any recordkeeping or reporting requirement granted under this paragraph may be conditioned on other recordkeeping or reporting requirements deemed necessary by the Administrator.

(6) Approval of any waiver granted under this section shall not abrogate the Administrator's authority under the Act or in any way prohibit the Administrator from later canceling the waiver. The cancellation will be made only after notice is given to the owner or operator of the affected source.

GenOn Northeast Management Company ("GenOn") requests a waiver from Mercury and Air Toxics Standards ("MATS") recordkeeping and/or reporting requirements for Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2), (the "Units"). This waiver request accompanies the MATS Extension request. Records of the MATS Initial Notification of Applicability and all extension and waiver requests will be maintained as required by regulation.

GenOn requests a waiver from MATS performance test requirements and recordkeeping and/or reporting requirements to allow for testing, tuning and optimization of installed controls to achieve MATS compliance. As stated in the cover letter of the MATS Extension request, Project completion schedule will provide very little time to gain experience to achieve mercury reductions on a continuous basis to demonstrate MATS compliance.

GenOn requests DEP grant Conemaugh a waiver from MATS recordkeeping and reporting requirements during the requested six month compliance extension.

CERTIFICATION

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the statements contained in this request are true, accurate and complete to the best of my knowledge.

Name of Responsible Official, Title

John A. Balog, General Manager - Conemaugh

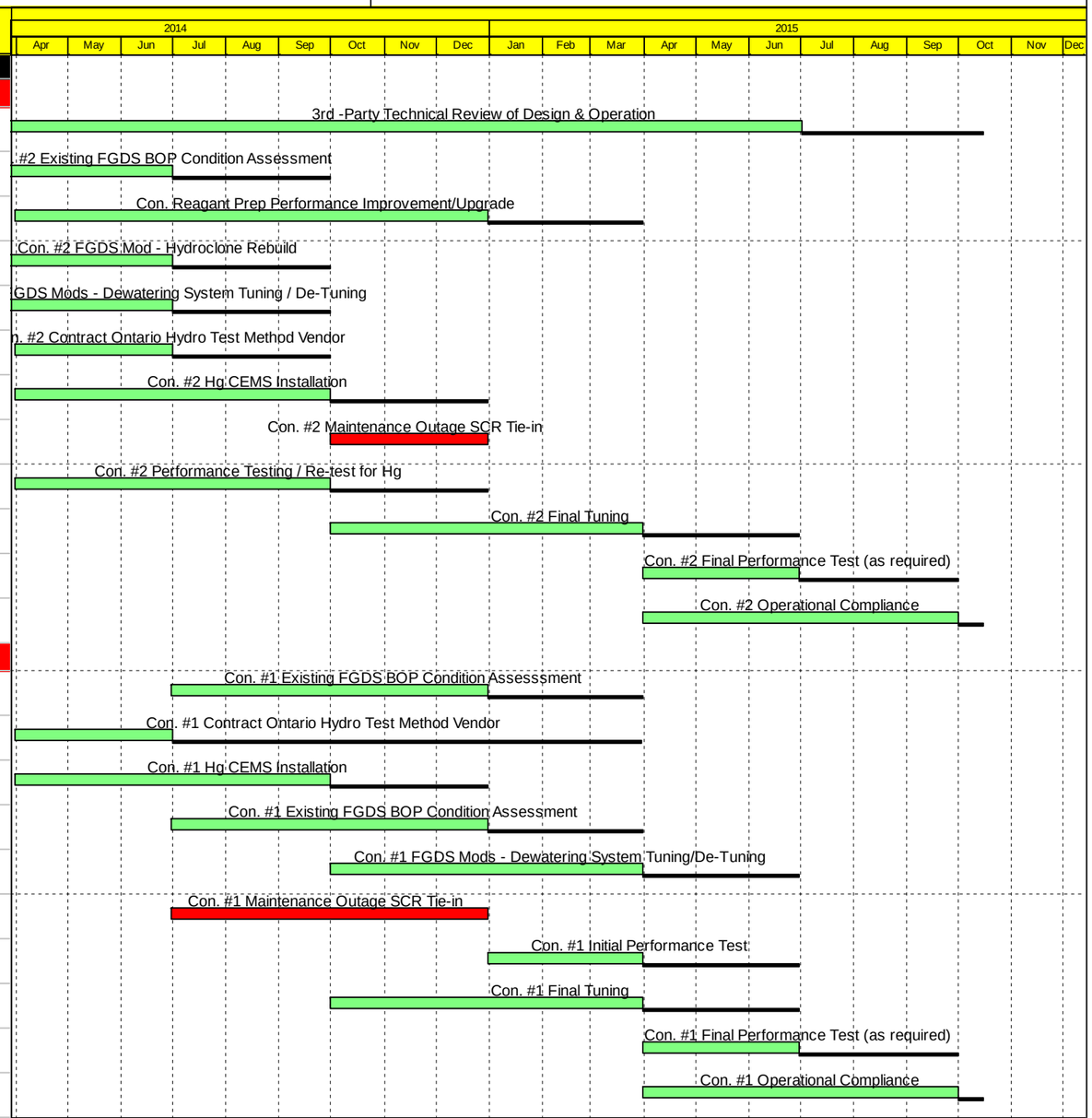
Signature of Responsible Official, Date

John A Balog 3/18/2014

ATTACHMENT D

Revised Project Schedule

Activity ID	Activity Name	OD	Start	Finish	Total Float	WBS
CFGDM FGD Upgrades - Level 1 Schedule (Rev.1)						
CFGDM.2 Unit 2						
A1000	3rd -Party Technical Review of Design & Operation	2688h	18-Mar-14 08*	01-Jul-15 17*	608h	CFGDM.2
A1010	Con. #2 Existing FGDS BOP Condition Assessment	600h	17-Mar-14 08*	30-Jun-14 17*	528h	CFGDM.2
A1020	Con. Reagant Prep Performance Improvement/Upgrade	1576h	31-Mar-14 08*	31-Dec-14 17*	512h	CFGDM.2
A1030	Con. #2 FGDS Mod - Hydroclone Rebuild	600h	17-Mar-14 08*	30-Jun-14 17*	528h	CFGDM.2
A1040	Con. #2 FGDS Mods - Dewatering System Tuning / De-Tuning	600h	17-Mar-14 08*	30-Jun-14 17*	528h	CFGDM.2
A1050	Con. #2 Contract Ontario Hydro Test Method Vendor	520h	31-Mar-14 08*	30-Jun-14 17*	528h	CFGDM.2
A1060	Con. #2 Hg CEMS Installation	1048h	31-Mar-14 08*	30-Sep-14 17*	528h	CFGDM.2
A1070	Con. #2 Maintenance Outage SCR Tie-in	536h	30-Sep-14 08*	31-Dec-14 17*	-240h	CFGDM.2
A1080	Con. #2 Performance Testing / Re-test for Hg	1048h	31-Mar-14 08*	30-Sep-14 17*	528h	CFGDM.2
A1090	Con. #2 Final Tuning	1048h	30-Sep-14 08*	31-Mar-15 17*	520h	CFGDM.2
A1100	Con. #2 Final Performance Test (as required)	528h	31-Mar-15 08*	30-Jun-15 17*	528h	CFGDM.2
A1110	Con. #2 Operational Compliance	1056h	31-Mar-15 08*	30-Sep-15 17*	88h	CFGDM.2
CFGDM.1 Unit 1						
A1120	Con. #1 Existing FGDS BOP Condition Assesssment	1064h	30-Jun-14 08*	31-Dec-14 17*	512h	CFGDM.1
A1130	Con. #1 Contract Ontario Hydro Test Method Vendor	520h	31-Mar-14 08*	30-Jun-14 17*	1560h	CFGDM.1
A1140	Con. #1 Hg CEMS Installation	1048h	31-Mar-14 08*	30-Sep-14 17*	528h	CFGDM.1
A1150	Con. #1 Existing FGDS BOP Condition Assessment	1064h	30-Jun-14 08*	31-Dec-14 17*	512h	CFGDM.1
A1160	Con. #1 FGDS Mods - Dewatering System Tuning/De-Tuning	1048h	30-Sep-14 08*	31-Mar-15 17*	520h	CFGDM.1
A1170	Con. #1 Maintenance Outage SCR Tie-in	1064h	30-Jun-14 08*	31-Dec-14 17*	-264h	CFGDM.1
A1180	Con. #1 Initial Performance Test	520h	31-Dec-14 08*	31-Mar-15 17*	520h	CFGDM.1
A1190	Con. #1 Final Tuning	1048h	30-Sep-14 08*	31-Mar-15 17*	520h	CFGDM.1
A1200	Con. #1 Final Performance Test (as required)	528h	31-Mar-15 08*	30-Jun-15 17*	528h	CFGDM.1
A1210	Con. #1 Operational Compliance	1056h	31-Mar-15 08*	30-Sep-15 17*	88h	CFGDM.1



ATTACHMENT E

Copy of Cover Letters for FGD Upgrade RFD and SCR Plan Approval Application

GenOn

121 Champion Way
Canonsburg, PA 15317

Brian.Green@GenOn.com
Writer's Direct Dial No.
(724) 597-8219

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

September 1, 2011
Mr. Mark Gorog
Southwest Region Environmental Engineer Manager
PA Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

RE: Conemaugh Power Plant (Permit Number TV-32-00059)
Request for Determination of Requirement for Plan Approval/Operating Permit (RFD)
Flue Gas Desulfurization Upgrades

Dear Mr. Gorog:

GenOn Northeast Management Company (GenOn, formerly RRI Energy), operator of Conemaugh Power Plant, is considering an to upgrade the existing flue gas desulfurization (FGD) absorber modules that service Units 1 and 2 (Source IDs 031 and 032, respectively) in the 2013 Outage for Unit 2 and the 2014 Outage for Unit 1 and is submitting the attached Request for Determination (RFD) application package to request an exemption from plan approval/operating permit requirements. Included in this submittal is Attachment A – RFD Form, Attachment B – Project Description, and Attachment C – NSR Emissions Calculations.

Currently the FGD system includes five absorber modules, two for each unit and a common spare. The FGD absorber modules, installed in 1994-95, are an open spray tower design with six spray levels, with five operating and one spare. The FGD absorber module upgrades (FGD Upgrades) are being considered to improve sulfur dioxide (SO_2) and mercury (Hg) removal efficiency anticipated as a result of the revised SO_2 National Ambient Air Quality Standard (NAAQS) and the proposed Mercury and Air Toxics Standards (MATS). Potential FGD Upgrades to improve control efficiency include the addition of a tray in each absorber, new spray header manifolds and nozzles, replacement of external recycle piping, and upgrades to existing recycle pumps, and reduce sneakage of untreated flue gas. The increased pressure drop across the absorbers due to the proposed upgrades will be addressed with the ID booster fan replacements included in the SCR Plan Approval Application submitted to the Department December 29, 2010. The FGD Upgrades will also include a fines

reinjection system that will increase mercury capture within the absorbers. Further explanation of the FGD Upgrades are included in Attachment B – Project Description.

The upgrades prescribed in this submittal are based on previous testing, analyses, and studies performed on these units to meet GenOn's targeted FGD performance specifications. If alternatives are proposed by the selected vendor GenOn will notify PaDEP.

No emissions increases of regulated pollutants are anticipated as a result of this project. On-site upgrades to the FGD absorber modules will commence in the 2013 Outage and will be complete following the 2014 Outage. PaDEP's review of the project is requested at the present time to provide for GenOn and the Owner's Groups' desire to approve and budget for the project.

In accordance with 25 Pa Code 127.14, a completed RFD form is included, in triplicate, as Attachment A. Please provide your concurrence that the subject project is exempt from plan approval requirements. If you have any questions or require any additional information concerning this matter, please contact me at (724) 597-8219.

Sincerely,

Brian W. Green
Air Quality Specialist

Attachments

Conemaugh/RFDs/FGD Upgrades

cc: Mark Wayner

GenOn

121 Champion Way
Canonsburg, PA 15317

Brian.Green@GenOn.com
Writer's Direct Dial Number
(724) 597-8219

December 29, 2010

CERTIFIED MAIL

Mr. Mark Wayner
Southwest Region Air Program Manager
PA Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Re: Conemaugh Power Plant (Permit No. TV-32-00059)
Plan Approval Application for
Selective Catalytic Reduction (SCR) Project

Dear Mr. Wayner:

GenOn Northeast Management Company (GenOn, formerly RRI) on behalf of the Conemaugh Owners Group (Owners Group) is pleased to submit a Plan Approval Application for a potential Selective Catalytic Reduction (SCR) Project at Conemaugh Power Plant. At this date, the Owners Group has not formally approved the project but is undertaking engineering design for installation of the SCR Project described in this application and desires to begin the permitting process so that the air permitting will not present an impediment to final project approval and construction schedules. The project represents a decision to voluntary install discretionary emissions controls on Conemaugh's existing Units 1 and 2. The SCR would be installed and operated as a strategy to reduce nitrogen oxide (NOx) emissions and allowance consumption for current and anticipated future emissions trading programs. There is no existing regulatory requirement that requires installation of the SCR. We appreciate the opportunity afforded us to discuss this project with you and other PADEP staff at your office on December 3, 2010.

Major components of the SCR installation under consideration include:

- SCR Reactor and Catalyst Layers
- Economizer Bypass and Hopper Replacement
- Economizer Ash Handling System
- Aqueous Ammonia Injection System
- New Exhaust Booster Fans and Connecting Ductwork
- Limestone Addition System
- Potential SO_3 Mitigation System

- Boiler Building Steel Reinforcement
- Instrumentation and Controls, and Support Equipment.
- Economizer Gas Outlet Temperature Control System

The primary goal of the project is a significant reduction in NOx emissions from Units 1 and 2. The SCR will also provide co-benefit reduction of other pollutants including mercury. The SCR's effect on emissions from the main boilers is described in Section 6.1 of the application.

Operation of the SCR will require ancillary support operations including new material handling sources, Limestone and SO3 Sorbent storage silos, and increases in operations of existing sources (paved road deliveries of SCR feedstocks). These changes do cause a minor increase in fugitive emissions from these support activities. The SCR is projected to result in a decrease in actual emissions of NOx, particulate matter, sulfuric acid mist and mercury from the facility. The projected decrease in particulate emissions from the main units is more than adequate to offset the minor increase in support operations. These emissions changes are reflected in the New Source Review (NSR) emissions analysis that is provided in Section 9 of the application. The analysis demonstrates that NSR is not applicable to the project.

GenOn recognizes that the proposed new material handling sources at the facility necessary to support the SCR are subject to PaDEP Best Available Technology (BAT) review. Section 7 of the application provides the BAT analysis and proposed controls for the Limestone and SO3 Sorbent storage filter systems.

As of the date of the submittal of this application, GenOn is not requesting any operational or emission rate limitations for the purpose of emissions reduction credit (ERC) generation. Due to this fact and the voluntary nature of the pollution control device installation, no new limitations should be imposed on the existing permitted sources.

There will be no change to the flue gas exit stack or the exhaust plume characteristics; therefore, no dispersion modeling is necessary for approval of installation of the SCR.

Use of 29% ammonia as the SCR reagent will require revision to the plant's 40CFR68 Chemical Accident Prevention Provisions Risk Management Plan (RMP) before the ammonia is brought on site. This revision will be submitted, as required, as soon as design details are confirmed.

Notices of submission of this application (Municipal Notifications) have been sent to the West Wheatfield Township Supervisors and the Indiana County Commissioners via Certified Mail. Copies of these letters are included in Section 10 of this application.

The Certified Mail receipts will be forwarded to you as soon as they are available. An application fee of $1,000 is attached to this original letter.

Enclosed are one original and two (2) copies of the application. As a result of the project's status (Owners Group final approval has not been received) and albeit a thorough conceptual engineering design has been completed, the potential for design changes does exist. Substantive revisions in final design will be communicated to the Department as soon as they are known.

Construction of the SCR project is tentatively scheduled to begin Summer 2011 with a projected in-service date for the first unit of Fall 2014.

Please note that effective December 3, 2010, RRI Energy, Inc. and Mirant Corporation merged to form GenOn Energy, Inc. The appropriate applications and documentation are being prepared for submittal to the Department and will be completed within the 30 days allowed by regulation. Also note that the tax identification number for the station has not changed with this merger.

If you have any questions, comments or require further information, in your review of the application, please call me.

Sincerely,

Brian W. Green
Air Quality Specialist

Attachments

cc: Mark Gorog (2 complete copies)